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U.S. DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

MATTHEW J. KING,

Defendant.

) INDICTMENT

) **1 : 15 CR 381**

) CASE NO. _____

) Title 18, Section 1956(a)(3)(B),
) United States Code

JUDGE NUGENT

COUNT 1

The Grand Jury charges:

On or about February 10, 2014, in the Northern District of Ohio, Defendant MATTHEW J. KING, with the intent to conceal and disguise the nature, location, source, ownership, and control of property believed to be the proceeds of specified unlawful activity, did knowingly attempt to conduct a financial transaction affecting interstate and foreign commerce involving property represented by M.T. (an individual known to the grand jury, but not indicted herein), who was acting at the direction of law enforcement, to be proceeds of specified unlawful activity, to wit: Defendant did accept \$20,000 in U.S. currency represented to be the proceeds of the distribution of controlled substances, in violation of Title 21, United States Code, Section 841(a)(1).

In violation of Title 18, United States Code, Section 1956(a)(3)(B).

COUNT 2

The Grand Jury further charges:

On or about February 18, 2014, in the Northern District of Ohio, Defendant MATTHEW J. KING, with the intent to conceal and disguise the nature, location, source, ownership, and control of property believed to be the proceeds of specified unlawful activity, did knowingly conduct and attempt to conduct a financial transaction affecting interstate and foreign commerce involving property represented by M.T. (an individual known to the grand jury, but not indicted herein), who was acting at the direction of law enforcement, to be proceeds of specified unlawful activity, to wit: Defendant did write a check in the amount of \$2,000.00 made payable to M.A.T. and Associates for the purpose of laundering U.S. currency that had been represented to KING to be the proceeds of the distribution of controlled substances, in violation of Title 21, United States Code, Section 841(a)(1).

In violation of Title 18, United States Code, Section 1956(a)(3)(B).

COUNT 3

The Grand Jury further charges:

On or about March 4, 2014, in the Northern District of Ohio, Defendant MATTHEW J. KING, with the intent to conceal or disguise the nature, location, source, ownership, or control of property believed to be the proceeds of specified unlawful activity, did knowingly conduct and attempt to conduct a financial transaction affecting interstate or foreign commerce involving property represented by M.T. (an individual known to the grand jury, but not indicted herein), who was acting at the direction of law enforcement, to be proceeds of specified unlawful activity, to wit: Defendant did write a check in the amount of \$2,000.00 made payable to M.T. for the purpose of laundering U.S. currency that had been represented to KING to be the

proceeds of the distribution of controlled substances, in violation of Title 21, United States Code, Section 841(a)(1).

In violation of Title 18, United States Code, Section 1956(a)(3)(B).

A TRUE BILL.

Original document - Signatures on file with the Clerk of Courts, pursuant to the E-Government Act of 2002.